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DANIEL SZALKIEWICZ & ASSOCIATES, P.C.  
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*Attorneys for Plaintiff Jaiya Webbs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Jaiya Webbs

Plaintiff,

v.

Brandon Elliott Green,

Defendant.

Case Action No. 24-cv-7763

**NOTICE OF MOTION FOR DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that Plaintiff, by and through her undersigned counsel, Daniel Szalkiewicz & Associates, P.C., shall move the Court, on November 18, 2024 for an order issuing a default judgment against Defendant Brandon Elliott Green in the amount of \$150,000 plus costs and attorney fees.

In support of her motion, Plaintiff submits the accompanying Memorandum of Law, the Declaration of Jaiya Webbs, dated October 29, 2024, the Declaration of Daniel Szalkiewicz, dated October 29, 2024 and the exhibits annexed thereto. A proposed Order is also submitted herewith pursuant to Local Rule 7.1(e).

Dated: October 29, 2024  
New York, New York

Respectfully submitted,

/s/Daniel Szalkiewicz  
By: Daniel S. Szalkiewicz, Esq. (DS2323)

**CERTIFICATE OF SERVICE**

I, DANIEL SZALKIEWICZ, HEREBY CERTIFY that on October 29, 2024, I served **NOTICE OF MOTION FOR DEFAULT JUDGMENT** and supporting papers on the Defendant via First Class Mail to Defendant's last known address:

Brandon Elliott Green  
4108 W Girard Avenue  
Philadelphia, PA 19104

Dated: October 29, 2024

By: /s/ Daniel S. Szalkiewicz